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July 6, 2023

VIA ECF

The Honorable Ona T. Wang
United States Magistrate Judge
United States Courthouse
500 Pearl Street, Room 20D
New York, NY 10007

MEMO ENDORSED.

Re: *The Sanborn Library LLC et al. v. ERIS Information Inc. et al.*,
Case No. 19-cv-2049 (JHR) (OTW) -- Consent Motion to Extend Expert Report
and Discovery Schedule

Dear Judge Wang:

Pursuant to Sections I.a. and I.e of Your Honor's Individual Practices, Defendants / Counterclaim-Plaintiffs ERIS Information Inc., Eco Log Environmental Risk Information Services Ltd., and ERIS Information Limited Partnership (collectively "ERIS"), through their undersigned counsel, write to request extensions of the following deadlines. Plaintiff / Counterclaim-Defendants The Sanborn Library LLC and Environmental Data Resources LLC (collectively "EDR") consents to this motion:

Event	Current Deadline	New Deadline
Rebuttal Expert Reports on Liability	July 14, 2023	July 28, 2023
Opening Expert Reports on Damages	August 25, 2023	September 8, 2023
Rebuttal Expert Reports on Damages	October 6, 2023	October 20, 2023
Expert Depositions	December 15, 2023	January 31, 2024 (see below)

This is the parties' second request for extension of the deadlines for expert reports and expert depositions; the parties' first request was granted (*see* Dkt. 236). This request is made for good cause and not for purposes of delay. The parties are diligently working to prepare their remaining expert reports, but have encountered issues in producing materials relied on by the parties' opening experts on liability. The parties have agreed to a slight extension of the deadlines for serving the remaining expert reports, so that these materials may appropriately be considered in responding to said opening expert reports.

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In addition, while the parties anticipate completing most expert depositions by the current December 15, 2023 deadline, due to scheduling conflicts that have arisen with ERIS' antitrust counsel, the parties request leave to take certain antitrust- and damages-related depositions up to and including January 31, 2024, subject to the availability of the relevant witnesses and counsel.

We thank the Court for its consideration and courtesies.

Respectfully submitted,

/s/ Justin A. MacLean

cc: Counsel of Record

Application **GRANTED**. The Court adopts the parties' proposed revised deadlines.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', is written over a horizontal blue line.

Ona T. Wang 7/7/23
U.S.M.J.